



**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**

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Washington, D.C. 20549

DIVISION OF ENFORCEMENT

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March 6, 2018

VIA ECF

Honorable Denise L. Cote
United States District Court
500 Pearl Street
New York, NY 10007

**Re: Securities and Exchange Commission v. Lek Securities Corp. et al.
Case No. 17 CV 1789 (DLC)**

Dear Judge Cote:

Pursuant to Paragraphs 1.A, 1.E, and 3.J of the Court's Individual Practices, plaintiff Securities and Exchange Commission and defendants Lek Securities Corporation and Samuel Lek jointly request that the Court permit an extension of eight business days until April 11, 2018, for the parties to complete three fact depositions. The parties previously requested, and were granted, an extension of the close of fact discovery from February 16, 2018 to March 30, 2018. The current extension request is solely to allow the parties to complete three fact depositions (on April 3, April 6, and April 11, 2018) after the current deadline. None of the other deadlines set forth in the schedule approved by the Court on December 13, 2017 (ECF No. 146) will change as a result of this extension. Defendants Avalon FA Ltd, Nathan Fayyer, and Sergey Pustelnik do not oppose this request.

Since the November 28, 2017 scheduling conference, the parties have worked cooperatively to schedule depositions of both parties and third parties. The parties have endeavored to notice depositions at a time that is convenient for all witnesses and their counsel, including third parties and their counsel. In an effort to accommodate the schedules of all, the parties wish to schedule three depositions during the first week and a half of April 2018, on the dates set forth above. Extending the deadline for these three depositions would not unduly extend the fact discovery period and would not affect any of the other deadlines in the case.

For these reasons, the parties respectfully request that the Court permit an extension of the fact discovery deadline until April 11, 2018.

Respectfully submitted,

/s/ David J. Gottesman
Deputy Chief Litigation Counsel
Division of Enforcement

(continuation of letter dated March 6, 2018 to Hon. Denise L. Cote)

AGREED:

/s/ Steven M. Dollar

Attorney for Defendants Lek Securities Corporation
and Samuel Lek

cc (via ECF): All counsel of record